

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

MELISSA TEMPEL,

Plaintiff,

v.

Case No. 2023-CV-1169

SCHOOL DISTRICT OF WAUKESHA

and

JAMES SEBERT,

Defendants.

JOINT STIPULATION TO EXTEND SCHEDULING ORDER DEADLINES

Plaintiff Melissa Tempel (“Plaintiff”) and Defendants School District of Waukesha (the “District”) and James Sebert (collectively “Defendants”) (Plaintiff and Defendants will be collectively referred to as the “Parties”), by their undersigned counsel, submit this Joint Stipulation to Extend the Scheduling Order Deadlines. In support of this Stipulation, the Parties state as follows:

1. On February 12, 2024, the Court entered a Scheduling Order (ECF No. 21), setting the expert disclosure deadline for August 30, 2024, and the rebuttal expert witness disclosure deadline for September 30, 2024;
2. Since the issuance of the Scheduling Order, the Parties have actively engaged in extensive discovery, including issuing and responding to written discovery requests and conducting numerous depositions;
3. To accommodate the ongoing discovery, on December 6, 2024 the Court previously granted the Parties’ request to extend the expert discovery deadlines, adjusting

the rebuttal expert deadline to January 17, 2025, the sur-rebuttal deadline to February 17, 2025, and the expert discovery deadline to February 28, 2025 (ECF No. 26);

4. Due to unforeseen family emergencies for both Plaintiff and Defendant, the Court granted an additional extension on February 28, 2025, further extending the expert discovery deadline to April 4, 2025 (ECF No. 30).

5. In accordance with the Court's deadlines discussed *supra*, Defendants disclosed their rebuttal expert, Michele J. Albers, on January 17, 2025;

6. Plaintiff disclosed her sur-rebuttal expert, Sarah E. Holmes, on February 17, 2025;

7. Since that time, the Parties have been engaged in briefing cross motions for summary judgment, and have cooperatively worked to schedule Ms. Albers' deposition, which is set for May 13, 2025 and Ms. Holmes' deposition, which is set for May 22, 2025;

8. To accommodate the upcoming depositions, the Parties agreed that the expert discovery deadline shall be extended to June 15, 2025;

9. Accordingly, the Parties respectfully request that the Court enter an Order extending the expert discovery deadline to June 15, 2025, while keeping all other deadlines in the Court's Scheduling Order (ECF No. 21), unchanged.

Signatures on next page.

Dated this 3rd day of April, 2024

Respectfully submitted,

s/ Christina A. Katt

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